

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HELENA DUMAS, individually and	)	
on behalf of all others similarly situated,	)	
	)	
Plaintiff,	)	No. 15 CV 5258
	)	
v.	)	
	)	
DELTA DENTAL OF ILLINOIS,	)	Hon. Andrea R. Wood
	)	
Defendant.	)	

**PLAINTIFF’S UNOPPOSED MOTION FOR FINAL APPROVAL  
OF THE PARTIES’ CLASS ACTION SETTLEMENT**

Plaintiff, Helena Dumas, individually and on behalf of a class of persons similarly situated, by her attorneys, respectfully moves for the entry of an Order granting final approval of the Parties’ Class Action Settlement Agreement (the “Settlement Agreement”). In support of her motion, Plaintiff submits a supporting Memorandum of Law, the Declarations of Class Counsel, and the Declaration of Kelly Kratz as authorized agent of the Claims Administrator, and state as follows:

1. On January 20, 2016, this Court granted preliminary approval of the settlement of the Plaintiff’s and the Settlement Class Members’ claims (the “Settlement”). (Doc. No. 31).
2. Final approval is appropriate where the court determines that a settlement is fair, adequate, and reasonable. *Synfuel Techs., Inc. v. DHL Express (USA), Inc.*, 463 F.3d 646, 652 (7<sup>th</sup> Cir. 2005).
3. The Settlement in this case was achieved in good faith and through arms-length negotiations, and is not the product of fraud or collusion.
4. The Settlement offers substantial monetary relief to the Settlement Class Members.

5. The Settlement is overwhelmingly supported by class members. Only three of the 123 Settlement Class Members submitted a request for exclusion, and no Class Member objected to the Settlement. These facts show strong support for the Settlement.

6. Plaintiff has provided the Settlement Class Members with adequate notice of the terms and conditions of the Settlement in a manner intended to maximize their due process rights.

7. Additionally, experienced Class Counsel have extensively analyzed the claims and issues herein, and certify that the Settlement is fair, reasonable, and adequate, and in the best interest of the Settlement Class Members. Thus, the Court should grant final approval of the Settlement, find the Settlement fair, reasonable, adequate, and in the best interests of the Settlement Class Members, approve Class Counsel's request for an award of attorneys' fees and costs, approve the Incentive Award to the Named Plaintiff, and enter the proposed final approval order dismissing this action.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter the proposed Final Approval and Dismissal Order attached as Exhibit 1 to Plaintiff's Memorandum of Law.

Respectfully submitted,

HELENA DUMAS, individually and on behalf of a  
certified class of persons similarly situated,

/s/ James X. Bormes  
One of Plaintiff's Attorneys

James X. Bormes  
Catherine P. Sons  
Law Office of James X. Bormes, P.C.  
8 South Michigan Avenue, Suite 2600  
Chicago, Illinois 60603  
(312) 201-0575

Thomas M. Ryan  
Law Office of Thomas M. Ryan, P.C.  
35 E. Wacker Drive, Suite 650  
Chicago, Illinois 60601  
(312) 726-3400